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CNC CHARLESTON
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U S NAVY RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS TO RCRA FACILITY INVESTIGATION
ADDENDUM AREA OF CONCERN 598 AND 599 (AOC 598 AND 599) ZONE E WITH
TRANSMITTAL CNC CHARLESTON SC

4/7/2003
CH2M HILL

AOCs 598 and 599 Zone E
RTC RPI Addendum (RO)

CH2MHILL TRANSMITTAL

To: Jerry Stamps
South Carolina Department of Health
and Environmental Control
Bureau of Land and Waste
Management
2600 Bull Street
Columbia, SC 29201

From: Sam Naik/CH2M-Jones

Date: April 7, 2003

Re: CH2M-Jones' Responses to Comments by SCDHEC regarding the *RFI Report Addendum, AOCs 598 and 599, Zone E, Revision 0*

Quantity	Description
4	CH2M-Jones' Responses to Comments by SCDHEC regarding the <i>RFI Report Addendum, AOCs 598 and 599, Zone E, Revision 0</i> – Originally Submitted on October 4, 2002

If material received is not as listed, please notify us at once.

Remarks:

Copy To:

Dann Spariosu/USEPA, w/att
Rob Harrell/Navy, w/att
Dean Williamson/CH2M-Jones, w/att
Gary Foster/CH2M-Jones, w/att

Risk Assessment Comments Prepared by Susan Byrd

1. Section 3.0, Interim Measures, Page 3-1 and Section 6.0, Summary of Closeout Issues, Page 6-2.

No information was provided regarding the analysis of sediment samples E598M0001 and E599M001. Even though the sediments were removed in 1999, the analytical data should be included in the report as well as a brief discussion of the findings. If contamination was present in the storm sewers, the potential for historical contaminant migration to the Cooper River should be discussed.

CH2M-Jones Response:

A discussion of the analytical results from the sediment sampling has already been included in Section 10.47.6 of the Zone E RFI Report, Revision 0 (EnSafe, 1997). Copies of the validated analytical data have also been included in Appendix H of the Zone E RFI Report, Revision 0.

Potential impacts to the Cooper River from the storm drain system discharges are being addressed as part of the Zone J RFI. It should be noted that the Navy/EnSafe team is currently performing an evaluation of whether there is any contamination discharging from the storm sewers at the CNC. They have conducted wet weather sampling of stormwater and have analyzed the collected stormwater for a wide range of analytes. In the event that this evaluation indicates a discharge of significant contamination that may be related to this site, any potential linkage will be reassessed at that time.

2. Section 5.1, COCs in Soil, Subsections 5.1.1 (BEQs) and 5.1.2 (Lead), Pages 5-1 and 5-2.
The text seems to disregard the elevated concentration of BEQs in sample E599SB007 (24,920 µg/kg) and E598SB002 (7,095 µg/kg) because the resample of these locations no longer exceeded the reference concentration. Since these concentrations exceeded the maximum detected on-site BEQ reference concentration, as well as the maximum reference concentration detected at or near railroad lines, please provide a more thorough explanation for the elevated concentrations and a more detailed rationale for the elimination of BEQs as COC.

Similarly, no explanation was given regarding the elevated concentrations of lead detected in surface soil at E598SB005 and subsurface soil samples E598SB001 and E598SB002. Resampling elevated concentration locations does not constitute disregarding the previously collected data.

CH2M-Jones Response:

Similar to other sites at the CNC where BEQ concentrations that are above the CNC sitewide reference concentrations have been detected in soil and BEQs have been identified as COCs, BEQs will be identified as COCs at AOCs 598 and 599 as well. Please see response to comment 1 from Jerry Stamps.

The RFI Report Addendum (RFIRA) does not disregard the previously collected data. All detections of lead have been considered, and are presented in Table 5-1 of the RFIRA. At locations where elevated lead was previously detected during the initial RFI, resampling was conducted by the Navy/CH2M-Jones team merely to verify if a source area of lead was present in the soils, as

indicated on lines 21-24, Page 5-2 of the RFIRA. Based on the analytical results from the resampling, no source area of lead was identified in the soils at AOCs 598 and 599.

The site average for lead detections in surface soils (with the historic elevated detections included) is 236.2 mg/kg, which is below the EPA target cleanup goal for lead of 400 mg/kg for unrestricted land use. Based on these observations, lead is not a surface soil COC.

The RFIRA presents two site averages for subsurface lead detections - with and without the July 2002 resampling data. Both of these averages include the previous elevated detections of lead in subsurface soil. As indicated in the RFIRA text and Table 5-1, the site averages are below the SSL for lead of 400 mg/kg, thereby indicating that lead is not a subsurface soil COC. Additional weight of evidence information regarding the absence of any indication of groundwater impact from soil lead concentrations has also been provided in the RFIRA (lines 1-5, Page 5-3).

As further indicated in the RFIRA, all soil samples were collected from underneath asphalt/concrete pavement, and these areas continue to remain paved, thus preventing direct exposure to these locations.